

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

FINAL

Conditional Major, Construction / Operating

Permit: F-07-036R1

Concept Packaging Group

Georgetown, KY 40324

Date: January 23, 2009

Elahe Houshmand, Reviewer

SOURCE ID: 21-209-00051

SOURCE A.I. #: 78082

ACTIVITY ID: APE20080002

**SOURCE DESCRIPTION:**

Concept Packaging Group produces specialty boxes from corrugated paperboard. Processes at the source include cutting, printing, gluing, and folding corrugated paperboard operations.

**MINOR PERMIT REVISION - F-07-036 R1:**

The Division received the Concept Packaging Group application to install a new Flexo Folder Gluer Machine (Equipment ID 140) on November 17, 2008, and has determined that this addition can be covered per 401 KAR 52:030 Section 14, Minor Permit Revisions. The new Flexo Folder Gluer machine has the capability to print, score, fold, and glue corrugated sheets and potentially can emit 31.0 tons per year of VOC. The source is not requesting additional VOC emissions above the already permitted levels (i.e. 50 tons of VOC).

In addition to the above request, after issuance of the initial permit, F-07-036, DAQ received two (2) applications for 502(b)(10) changes. These changes, listed below, were approved and are incorporated into the revised permit, F-07-036 R1:

1. Activity # APE20070002 - Installation of a new semi-automatic, flat bed die cutter (Atom Die Cutter, Equipment ID 135) at the Georgetown, Kentucky facility.
2. Activity # APE20080001 - Installation of a new hot melt laminator (Equipment ID 116) at the Georgetown, Kentucky facility.

**INITIAL PERMIT - F-07-036**

On January 2, 2007, the Division received an application requesting to install a new Rite-Size machine (Equipment ID 120) at the Georgetown, Kentucky facility. The new machine will slot, score, and print corrugated paperboard. The potential VOC emission of the Rite-Size machine is less than one ton per year.

**COMMENTS:**

Currently the facility operates as a registered source. A review by the Division has determined that Concept Packaging Group calculated its emissions by using reduced feed speed (40 % of maximum speed of each press), limited hours of operation (using ratio of run time over total time) and assuming 5-10 % ink coverage area. DAQ believes any of these bottlenecks can be relaxed or changed and potentially the source can emit more than the major source threshold of 100 tons per year of VOC. As a result, to avoid a major source status, the source has voluntarily accepted a VOC emissions limit of 50 tons per year which makes it a Conditional Major source.

**TYPE OF CONTROL AND EFFICIENCY:**

There are no control devices in place for VOC emissions. To control PM / PM10 emissions, scraps from EP#1, 2, 3 & 4 are routed to Cyclone with 90% PM control efficiency.

**EMISSION FACTORS:**

AP-42

Engineering calculations

**APPLICABLE REGULATIONS:**

**401 KAR 59:010**, New Process Operation, is applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate matter emissions commenced after July 2, 1975.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

VOC emissions shall be less than 50 tons during any consecutive twelve (12) month period.

**PERIODIC MONITORING:**

Opacity and particulate emissions are assumed to meet limits when particulate control is in place and functioning. PM control is monitored by visual inspection once per shift.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.